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October 25, 2024

Via ECF

Honorable Madeline Cox Arleo
United States District Judge
Martin Luther King, Jr. Federal Building & Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: United States v. Paul Parmar, No. 18-CR-735 (D.N.J)

Dear Judge Arleo:

Enclosed herewith please find the correspondence accompanying the production Windels Marx Lane & Mittendorf, LLP hand delivered to the defendant, Paul Parmar, in connection with the above-referenced matter earlier today.

Respectfully submitted,

Jeffrey C. Hoffman
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October 25, 2024

By Hand

Mr. Paul Parmar
19 Colts Gait Lane
Colts Neck, New Jersey 07722

Re: United States v. Paul Parmar, No. 18-CR-735 (D.N.J)

Dear Mr. Parmar:

Following your request, and in compliance with the Court's order dated October 15, 2024, we enclose the client file associated with our representation of you in connection with *United States v. Paul Parmar*, No. 18-cr-735 (D.N.J.).

Enclosed are the following:

- (1) A USB drive labeled "#1" containing over 2 GB of data consisting of all documents and emails from my working file, and all documents stored on the firm's internal Worldox filing system for this matter.
- (2) A hard-drive labeled "#2" containing approximately 190 GB (zipped) of discovery materials. The discovery material consists of the various collections and productions the firm had stored on our internal cloud server, most of which is contained in a folder entitled "dbase," and a subsequent sub-folder entitled "PPJH," which contains numerous sub-folders containing the various productions. Documents we collected and/or isolated are contained in other folders on the drive.
- (3) A hard-drive labeled "#3" containing approximately 817 GB of the following:
 - a. Scanned copies of hard copy documents in our possession related to this matter, including my working files and files stored in our firm's records department; and
 - b. Copies of USB drives, hard-drives, and micro-SDs in our possession containing information regarding this matter, which may be duplicative of other items contained elsewhere.

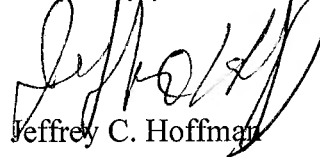
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(4) A USB drive labeled “#4” containing approximately 2 GB of the following:

- a. Emails collected from my Outlook account (jhoffman@windelsmarx.com) that reference your name, your email addresses or contact aliases, and/or the docket number 18-cr-735, and that were sent to or from you, Tim Parlatore, Maryam Hadden, or senders or recipients with email addresses with the domains @usdoj.gov or @uscourts.gov;
- b. Per your request on October 18, 2024, emails collected from my Outlook account that reference the name “Altorelli”; and
- c. Text messages collected from my cell phone among me, you, Maryam Hadden, and Tim Parlatore.

Each of the foregoing drives is password protected. We will provide the passwords to you by separate email.

Very truly yours,



Jeffrey C. Hoffman

cc: Timothy Parlatore, Esq. (via email w/o encl.)
Carolyn Silane, Esq. (via email w/o encl.)
Olta Bejleri, Esq. (via email w/o encl.)

W/Encl.